feature of machining at least one region to a shallow depth on at least one side of the plates (claims 1 and 21, clause a) and then stacking and securing the plates together to thereby produce "... first gaps at the discreet regions between the surfaces of adjacent plates..." (claims 1 and 21, clause d). Article claim 11, directed to the mold per se, is worded slightly different but sets forth the similar feature whereby the "... first set of machined regions in a minor portion of their faces defining a first set of gaps between adjacent plates ..."

A careful review of Masayuki gives no indication or suggestion that his segments 3 maybe machined prior to assembly with adjacent segments 3. On the contrary, according to the partial translation (copy forwarded herewith) of JP 02-295706, "... on the tread mold side of the laminated body, a narrow slit is formed between segments 3 and 3 which are contiguous to each other." Thus, it is clear that the segments 3 and 3 are joined together to form the laminated body prior to the forming of the narrow slit 6.

Additionally with respect to claims 10 and 29 there is no teaching or suggestion in JP 02-295706 of engraving the pattern of a tire tread when the stacked plates are assembled.

In view of the foregoing, reconsideration of the application and allowance of claims 1 – 3, 5 – 11, 13, 21 – 29 are respectfully solicited.

Respectfully submitted,

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